

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

LIBERTY MUTUAL FIRE INSURANCE
COMPANY,

Plaintiff,

v.

GT, et al.,

Defendants.

CASE NO. 4:24-CV-01195-SEP

**MEMORANDUM REGARDING POTENTIALLY ADVERSE CASELAW AS TO ONE
OR MORE OF GT'S AFFIRMATIVE DEFENSES**

COMES NOW Defendant GT, by and through Counsel, and hereby notifies the Court of potentially adverse case law that could impact one or more of GT's affirmative defenses. The case is *Morgan v. State Farm Fire and Cas. Co.*, 344 S.W.3d 771 (Mo. Ct. App. SD 2011). While GT contends that *Morgan* and this matter have legally significant and material differences which make *Morgan* inapplicable to this matter, GT brings that *Morgan* to the Court's attention for purposes of fulfilling professional obligations and for purposes of transparency and candor with the Court.

Respectfully submitted,

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